

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In Re:
MICHELLE I. ZAGORSKI
Debtor

Chapter 13

Case No. 21-11638-mdc

**SUPPLEMENTAL DECLARATION IN SUPPORT OF
MOTION FOR RELIEF FROM AUTOMATIC STAY**

I, Thomas Caragher, declare under penalty of perjury as follows:

1. I am employed as a Vice President Loan Documentation of Wells Fargo Bank, N.A. (“Movant”) and I am authorized to sign this supplemental declaration on behalf of Movant. This supplemental declaration is provided in support of the Motion for Relief from Stay (the “Motion”) filed contemporaneously herewith.

2. As part of the responsibilities of the Movant, I have personal knowledge of and am familiar with the types of records maintained by Movant in connection with the loan that is the subject of the Motion (the “Loan”) and the procedures for creating those types of records. I have access to and have reviewed the books, records and files of Movant that pertain to the Loan and extensions of credit given to Debtor concerning the property securing such Loan.

3. The information in this declaration is taken from Movant’s business records regarding the Loan. The records are: (a) made at or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information in the business record, or from information transmitted by persons with personal knowledge; (b) kept in the course of Movant’s regularly conducted business activities; and (c) it is the regular practice of Movant to make such records.

4. The Debtor, Michelle I. Zagorski, has executed and delivered or is otherwise

obligated with respect to that certain promissory note referenced in the Motion (the "Note").

Pursuant to that certain Mortgage referenced in the Motion (the "Mortgage"), all obligations of the Debtor under and with respect to the Note and the Mortgage are secured by the property referenced in the Motion.

5. As of June 30, 2023, there are one or more defaults in paying Debtor's postpetition amounts due with respect to the Note.

6. As of June 30, 2023, the unpaid principal balance of the Note is \$136,350.02.

7. The following chart sets forth those postpetition payments, due pursuant to the terms of the Note, that have been missed by the Debtor as of June 30, 2023:

Number of Missed Payments	From	To	Missed Principal and Interest	Missed Escrow (if applicable)	Monthly Payment Amount	Total Amounts Missed
1	March 1, 2023	March 1, 2023	\$103.67	N/A	\$103.67	\$103.67
3	April 1, 2023	June 1, 2023	\$752.18	N/A	\$752.18	\$2,256.54
Less partial payments (suspense balance): (\$0.00)						

Total: \$2,360.21


8. As of June 30, 2023, the total postpetition arrearage/delinquency is \$2,360.21, consisting of (i) the foregoing total of missed postpetition payments in the amount of \$2,360.21, plus (ii) the following postpetition fees¹:

¹ The total of missed postpetition payments for this escrow loan include any missed escrow payments. Such missed escrow payments include amounts assessed for taxes and insurance and any previously assessed escrow shortage amount (if applicable). To avoid duplication, postpetition advances (if any) made for insurance, real estate taxes, or similar charges are not listed separately to the extent such advances would have been paid from the missed escrow payments. As part of the next annual RESPA analysis, movant will determine whether the escrow payment assessed

Description	Amount
N/A	\$0.00

9. Attached hereto as Exhibit "A" is a postpetition payment history.

Pursuant to 28 U.S.C. §1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Printed name: Thomas Caragher

Title: Vice President Loan Documentation

Date: July 18, 2023

to the debtor (including the missed escrow payments) result in a projected escrow shortage or overage. All rights are hereby reserved to assert or request any escrow amounts in accordance with RESPA and the total postpetition arrearage/delinquency is qualified accordingly.